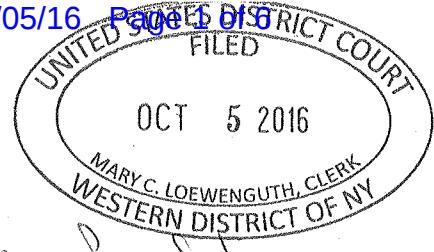


United States District Court
Western District Court



Shawn Woodward

plaintiff

v.

Muslim Chaplin Afify, et al

defendants

Motion for Subpoena

Duces Tecum

14-CV-856

RJA-JJM

Plaintiff Shawn Woodward makes this Motion for Subpoena Duces Tecum on the following non-party members as follows:

1.) Defense Counsel for Defendant Sewalt in Hutchinson v. West, et al., 04-CV-135 (WDNY 2004) to allow Plaintiff to inspect, review and copy any Interrogatory responses from Defendant Sewalt; the initial or amended complaint against Defendant Sewalt; any misbehavior reports ("MBRs") issued against Plaintiff Hutchinson by Defendant Sewalt; any Unusual Incident Reports ("UIR") involving any Use of Force on Plaintiff Hutchinson by Defendant Sewalt; any grievances and/or letters of complaints wrote by Plaintiff Hutchinson against Defendant Sewalt; any documents related to any suspensions, demotions, disciplinary actions, administrative actions or labor hearings against Defendant Sewalt that was

provided to Plaintiff Hutchinson.

2) Defense Counsel for Defendant Sewalt in Robinson v. Fisher, et al, 07-CV-402 (WDNY 2007) allow Plaintiff to review, inspect and copy Interrogatory responses from Defendant Sewalt; the VTRs involving the Use of Force on Plaintiff Robinson by Defendant Sewalt; any MBRs issued by Defendant Sewalt against Plaintiff Robinson; any grievances and letters of complaint wrote against Defendant Sewalt by Plaintiff Robinson; any documents related to any suspensions, administrative leave, disciplinary actions, and /or transcripts / testimony of Defendant Sewalt's labor arbitration hearing, regarding Plaintiff Robinson.

3) Defense Counsel for Defendant Sewalt and Plaintiff Counsel for Plaintiff Pattiasina in Pattiasina v. Sewalt, et al, 12-CV-6170 (WDNY 2012) allow Plaintiff to review, inspect and copy any Interrogatory responses from Defendant Sewalt; any transcripts from a deposition conducted on Defendant Sewalt; the VTRs involving the Use of Force on Plaintiff Pattiasina; any MBRs issued against Plaintiff Pattiasina stemming from the incident with Defendant Sewalt and others alleged in Plaintiff Pattiasina's § 1983 claim; any grievances and / or letters of complaint filed against Defendant Sewalt by Plaintiff Pattiasina; any suspension, administrative actions, disciplinary actions and /or transcripts / testimony of Defendant Sewalt's labor arbitration hearing regarding Plaintiff Pattiasina.

4) Defense Counsel for Defendant (deceased) Afify and Plaintiff Counsel for Plaintiffs Peoples, et al in Peoples, et al v. Fisher, et al, 13-CV-6113 (WD-NY 2013) allow Plaintiff to review, inspect and copy any transcripts of a deposition conducted on Defendant Afify; any orders to any DOCCS employees commanding them to allow Shi'ite Muslims at Elmira Corr Fac to participate in the fasting of Ramadan with the Nation of Islam members due to alleged biasness of Defendant Afify towards Shi'ite Muslims such orders being issued by the Western District Court in 2013, 2014, 2015 or 2016;

5.) Acting Commissioner Anthony J. Annuzzi of DOCCS allow Plaintiff to review, inspect and copy any grievances and /or letters of complaints filed against Defendants Sewall and /or Afify by other employees of DOCCS; the responses to those grievances and /or letters of complaint from Defendants Sewall and /or Afify; the To/From, report, memorandum and /or administrative recommendation from Elmira Corr Fac's Deputy Superintendent of Program Henderson and /or Superintendent Surge regarding the incident alleged in Plaintiff Robinson regarding Defendant Sewall and non-
party members Knuth and Kramer in 2006 see, Robinson v. Fisher, et al, supra.

Conclusion:

6) That this Court direct the United States Marshal Service to perform the service of serving the subpoenas by Certified Mail on the above listed non-party members, without payment from Plaintiff, see, Verhow v. Hess, 13-cv-00012, 2014 WL 297342 at 1 (W.D.N.Y 1-27-14) (McCarthy, M.J) quoting the Western District Court's Pro Se Litigation Guide-lines, p. 20 (revised August 2013); Smith v. Benson, 2011 WL 839736 at 1 (W.D.N.Y 2011) (Schroeder, M.J).

October 3, 2016

Sh Woodward
Shawn Woodward 00A6863
Orleans Corr Fac
3531 Gaines Basin Rd
Albion, NY 14411

October 3, 2016

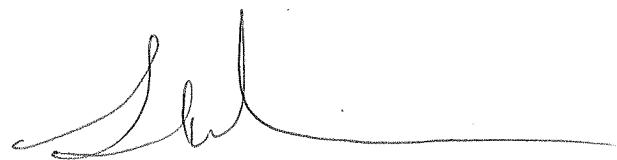
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Clerk of the Court
Western District Court
2 Niagara Square
Buffalo, NY 14202

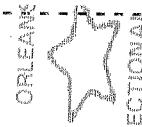
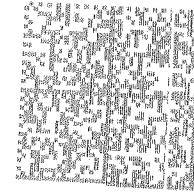
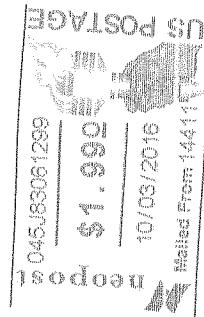
RE: Woodward v. Afify, et al., 14-cv-856

Dear Clerk,

Enclosed for filing is a Motion for a Subpoena (4 pages) and Motion to Compel Documents and Interrogatory Responses (22 pages) with attachments.



Shawn Woodward



ORLEANS CORRECTIONAL FACILITY

3531 Gaines Basin Road
Albion, New York 14411-9199

NAME: Shawn Woodward DIN: 00000000000000000000000000000000 RRECTIONAL

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